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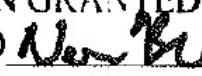
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September 1, 2020

Via ECF

Hon Vernon S. Broderick, U.S.D.J.
United States Courthouse
Southern District of New York
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 9/3/2020

Re: Ovalles Acosta v. Prudent Management et al
Case No.: 17-cv-07590

Your Honor:

This office represents Jose A. Ovalles Acosta ("Plaintiff") in the above referenced action brought pursuant to the Fair Labor Standards Act ("FLSA") and New York Labor Law ("NYLL"). We write to request a thirty (30) day extension of time to file a modification to the Settlement Agreement along with a renewed motion for settlement approval pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199, 206 (2d Cir. 2015). We apologize to the Court for the lateness of this request.

On July 23, 2020, the Court denied the Parties' joint motion to approve the settlement agreement in the above action stating that the release in the agreement was overbroad. Pursuant to the Court's July 23 Order the Parties were to file a revised settlement agreement on or before August 24, 2020. After consultation with counsel, the Parties drafted a modification to the settlement agreement which is in the process of being reviewed and executed by the Parties. Due to the procedural history of the action, the Plaintiff has asked for more time to specifically review the modification and to receive a written translation of same. Given this, we believe a thirty (30) day extension of time to file the fairness from today until October 1, 2020 will allow the Parties to fully execute the modification to the settlement Agreement. No previous requests for an extension of time have been requested regarding this issue.

We thank the Court for its courtesy in this regard.

Respectfully Submitted,
LAW OFFICE OF WILLIAM CAFARO

A handwritten signature in blue ink, appearing to read 'Amit Kumar', is positioned above the typed name.

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